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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ALEXANDRA POOLOS,

Plaintiff,

-v-

PARAMOUNT GLOBAL, ET AL.,

Defendants.

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DATE FILED: 12/12/2024

ORDER

23-CV-8896 (GHW) (HJR)

HENRY J. RICARDO, United States Magistrate Judge.

The Court held a telephone conference to address Plaintiff's three Letter Motions to Compel Defendants' production of comparator information. ECF Nos. 48-50. For the reasons discussed during the conference, each of Plaintiff's three Letter Motions is GRANTED IN PART and DENIED IN PART.

Defendants are ORDERED to produce documents sufficient to show all complaints made against Named Comparators Shachar Bar-On, Ira Rosen, David Levine, Will Croxton, and Matthew Richman, Defendants' response thereto, and the reasons therefor during the period from January 1, 2016 to the present. Defendants are further ORDERED to produce documents sufficient to show all complaints made against Named Comparator Michael Radzutsky, Defendants' response thereto, and the reasons therefor during the period from January 1, 2015 to the present. Plaintiff's First Letter Motion to Compel, ECF No. 48, is otherwise DENIED.

Defendants are ORDERED to produce documents sufficient to show any complaints made, Defendants' response thereto, and Defendant's reasons therefor,

for <u>60 Minutes</u> Senior Producers, Producers, Senior Editors, and Editors, excluding Plaintiff, who Defendants fired during the period from January 1, 2019 to the present. Plaintiff's Second Letter Motion to Compel, ECF No. 49, is otherwise DENIED, in particular, to the extent it concerns any CBS News employee outside of 60 Minutes and Neeraj Khemlani.

Defendants are ORDERED to produce documents sufficient to show any complaints made against Michael Gavshon, Defendants' response thereto, and the reasons therefor for the period from January 1, 2019 to the present. The parties are directed to confer and to submit for the Court's approval a confidentiality order under which all documents concerning Michael Gavshon shall be designated "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY" by December 19, 2024. Plaintiff's Third Letter Motion to Compel, ECF No. 50, is otherwise DENIED.

The Clerk of Court is respectfully directed to terminate the Letter Motions at ECF Nos. 48-50 as GRANTED IN PART and DENIED IN PART.

SO ORDERED.

Dated: December 12, 2024 New York, New York

Henry J. Ricardo

United States Magistrate Judge